

# SAN ANDREAS SANITARY DISTRICT

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DISTRICT MANAGER  
Hugh Logan

August 2, 2018

Mr. Tyson Pelkofer  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Ranch Cordova, Ca 95670

## **Subject: San Andreas Sanitary District (District) Tentative Order (NPDES CA0079464) Comments**

Dear Tyson,

The District appreciates you working closely with our staff and consultant to facilitate the early renewal of the District's NPDES permit, including taking the time to address the District's concerns, comments, and questions throughout the process. The District is in support of the Order and provides only the below-listed minor comments on the Tentative Order for your consideration.

1. *Page 5, Table 4* – Remove BOD and TSS load limits using the same rationale as the City of Lincoln Preliminary Draft Order (i.e., based on 40 CFR part 122.45(d) and (f)).
2. *Page 5, IV.A.1.e.i* – Because this is not a Title 22 reuse of effluent, the District requests a monthly median instead of a 7-day median limitation on Total Coliform Organisms. This would be consistent with the Table 5 Land Discharge Specifications for Total Coliform organisms. With the 20:1 dilution requirement, realistically there is likely greater pathogen risk in the river than in disinfected effluent.
3. *Page 13, VI.C.2.a.ii(c) and Page 14, VI.C.2.a.ii(d)* – “at 100 percent effluent...” should read “at the instream waste concentration (8.3% effluent)...”. Because of the application of dilution credits, testing 100% effluent will not provide useful information. Further, per Table E-4, chronic toxicity testing is not required on 100% effluent.

Feel free to contact me if you have any questions regarding the above comments.

Sincerely,

Hugh Logan, District Manager

c: Eric Zeigler, Stantec Consulting Services